

# **EXHIBIT 3**

**COURT OF COMMON PLEAS MONTGOMERY COUNTY,  
PENNSYLVANIA**

OLANREWAJU ODEDEYI  Plaintiff.  v.  AMERICAN AIRLINES Defendant.	COURT OF COMMON PLEAS MONTGOMERY COUNTY, PA  CIVIL ACTION  NO. 2023-06003
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**NOTICE**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

**LAWYER REFERENCE AND INFORMATION SERVICE**

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Lawyer Referral and Information Service  
One Reading Center  
Philadelphia, PA 19107-2911  
Telephone (215) 238-1701

**AVISO**

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELÉFONO A LA OFICINA CUYA DIRECCIÓN SE ENCUENTRA ES CRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

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**COMPLAINT**

1. Plaintiff herein is Olanrewaju Odedeyi ("Odedeyi") is an adult individual with an address of 2142 Birch Drive, Lafayette Hill, PA 19444.

2. Defendant herein is American Airlines, a US-based airline headquartered in Fort Worth, Texas.

**JURISDICTION AND VENUE**

3. Jurisdiction and venue are proper given that this is an appeal from the Montgomery County 38-1-23 Magisterial District Court.

**FACTS**

4. On January 1, 2023, Odedeyi purchased flight tickets for himself and his family for flights operated by the defendant.

5. The tickets were purchased for a round trip journey from Philadelphia to Houston.

6. On Friday, January 20, 2023, Odedeyi and his family traveled to Houston on AA 4475.

7. Odedeyi and his family were to travel on Monday January 23rd 2023 to Philadelphia on AA 2307 with a 1.30PM departure time.

8. On or about 12.30PM on Monday January 23rd 2023, Defendant or its agent updated the flight's departure time from 1.30PM to 1.40PM.
9. On or about 12.30PM on Monday January 23rd 2023, Defendant or its agent updated the original flights departure gate that was published when Odedeyi checked in for his flight.
10. Defendant via the iOS App provides a mobile application that provides information to customers including upcoming flight time, flight gates.
11. The installed application on Odedeyi's mobile phone was updated to reflect the changes for the flight's departure time and flights departure gate by Defendant or its agent were published.
12. Odedeyi and his family showed up at the boarding gate 23 minutes prior to the updated departure time.
13. Defendant did not allow Odedeyi and his family to board their flight.
14. Defendant departed before the original departure time.
15. Defendant departed the flight before the updated departure time.
16. Defendant closed the boarding gate prior to the required time under the condition of carriage.
17. Defendant rebooked Odedeyi and his family on another non direct flight via Phoenix.
18. Odedeyi and his family arrived back at Philadelphia 6 hours after their original arrival time.

**CAUSE OF ACTION**

**Count I – Breach Of Contract**

19. Odedeyi incorporates the foregoing averments of this pleading as if set forth at length within this Count.
20. Odedeyi commenced this action in Montgomery County 38-1-23 Magisterial District Court with docket number MJ-38123-CV-0000019-2023.
21. At the MDJ hearing, Defendant through its Attorney informed Judge Lukens that it waited for Odedeyi and his family to board the flight until 1.22PM.
22. Defendant failed to perform its obligations under the Agreement.
23. Defendant failure of performance constituted a breach of the Agreement.
24. Defendant did not allow Odedeyi and his family to fly at the original and the updated flight time.
25. Defendant contractual breach has caused Plaintiffs to suffer damages, including losses already incurred and anticipated additional losses.

**WHEREFORE**, Odedeyi respectfully requests the entry of judgment in his favor in an amount not exceeding \$50,000.00, including compensatory damages, expectation damages, incidental damages, and consequential damages, together with taxable costs and such other and further relief as justified by law or equity.


Date: 04.07.2023

Respectfully submitted,  
**OLANREWaju ODEDEYI**  
By: /s/ Olanrewaju Odedeyi  
Olanrewaju Odedeyi

**VERIFICATION**

I, OLANREWAJU ODEDEYI, hereby verify the factual statements contained in the foregoing complaint are true and correct to the best of my present knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities.

Date: 04/07/2023



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OLANREWAJU ODEDEYI